

# **Exhibit 1**

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

UNIVERSAL CONNECTIVITY  
TECHNOLOGIES INC.,

Plaintiff,

v.

LENOVO GROUP LIMITED,

Defendant.

Case No. 2:23-cv-00449-JRG

**JURY TRIAL DEMANDED**

**PLAINTIFF'S FIRST SET OF INTERROGATORIES  
TO DEFENDANT**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Universal Connectivity Technologies Inc. ("UCT") serves its First Set of Interrogatories on Defendant Lenovo Group Limited ("LGL"), as follows:

**DEFINITIONS**

1. The term "Action" refers to the case captioned *Universal Connectivity Technologies Inc. v. Lenovo Group Limited*, No. 2:23-cv-00449-JRG (E.D. Tex.).

2. The term "Accused Product(s)" means the products listed in Exhibit A to UCT's Disclosure of Asserted Claims and Infringement Contentions for Defendant Lenovo Group Limited dated May 15, 2024, and any Lenovo products (such as laptops, desktops, monitors, and/or docking stations) that support any of the following standards: USB 3.0 or later, USB-C 1.0 or later, USB4 1.0 or later, USB Power Delivery 2.0 or later, DisplayPort 1.0 or later, DisplayPort Alt Mode 1.0 or later, HDMI Alt Mode for USB-C, and/or PCIe 3.0 or later.

the extent that any product has changed or changed version thereof between the time of its introduction and trial in this matter, You should separately list each version and the first date and last date corresponding to each version.

**INTERROGATORY NO. 2:**

For each of the LGL products identified in response to Interrogatory No. 1, identify the supplier, model name and number for the chipset used therein that is responsible for the DisplayPort, PCIe, and/or USB functionality. This includes identifying any source code version numbers and dates each product was sold with each identified version of such source code.

**INTERROGATORY NO. 3:**

For each of the LGL products identified in response to Interrogatory No. 1, identify the supplier, model name and number for any power delivery controllers used therein that is responsible for the DisplayPort, PCIe, and/or USB functionality. This includes identifying any source code version numbers and dates each product was sold with each identified version of such source code.

**INTERROGATORY NO. 4:**

For each of the LGL products identified in response to Interrogatory No. 1, identify the supplier, model name and number for any embedded controllers used therein that is responsible for the DisplayPort, PCIe, and/or USB functionality. This includes identifying any source code version numbers and dates each product was sold with each identified version of such source code.

**INTERROGATORY NO. 5:**

For each of the LGL products identified in response to Interrogatory No. 1, identify the supplier, model name and number for any graphics cards and drivers used therein that is responsible for the DisplayPort, PCIe, and/or USB functionality. This includes identifying any

what product features drive customer purchase decisions, or demand for, or willingness to pay for any product, (ii) the role the accused functionalities play in driving or influencing customer demand or willingness to pay for any product, (iii) the market in which the products compete (including but not limited to personal computing markets); (iv) the products that compete with the products; and (v) the unit sales, revenue, price, and features of products that compete in the same market as the products.

**INTERROGATORY NO. 10:**

For each interrogatory served by UCT in this Action, separately identify for each interrogatory response all relevant documents and the three persons (other than outside litigation counsel) who are most knowledgeable about your response.

Dated: June 14, 2024

Respectfully submitted,

By: /s/ Brett E. Cooper  
Brett E. Cooper (NY SBN 4011011)  
[bcooper@bclgpc.com](mailto:bcooper@bclgpc.com)  
Seth R. Hasenour (TX SBN 24059910)  
[shasenour@bclgpc.com](mailto:shasenour@bclgpc.com)  
Jonathan Yim (TX SBN 24066317)  
[jyim@bclgpc.com](mailto:jyim@bclgpc.com)  
Drew B. Hollander (NY SBN 5378096)  
[dhollander@bclgpc.com](mailto:dhollander@bclgpc.com)

**BC LAW GROUP, P.C.**  
200 Madison Avenue, 24th Floor  
New York, NY 10016  
Tel.: (212) 951-0100

***Attorneys for Plaintiff Universal Connectivity Technologies Inc.***